

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

GT Real Estate Holdings, LLC,

Debtor.¹

Chapter 11

Case No. 22-10505 (KBO)

**NOTICE OF *SECOND* AMENDED² AGENDA OF MATTERS SCHEDULED FOR
HEARING ON JUNE 29, 2022 AT 10:00 A.M. (EASTERN)**

**THE REMOTE HEARING WILL BE CONDUCTED ENTIRELY BY ZOOM AND
REQUIRES ALL PARTICIPANTS TO REGISTER IN ADVANCE. COURTCALL WILL
NOT BE USED TO DIAL IN.**

PLEASE USE THE FOLLOWING LINK TO REGISTER FOR THE HEARING:

<https://debuscourts.zoomgov.com/meeting/register/vJIsceqgrT4rEjmT4ZnTuL6K3sme7uWv024>

**PLEASE NOTE: THE COURT REQUESTS THAT ALL PARTIES REGISTER WITH
ZOOM NO LATER THAN 2 HOURS PRIOR TO THE START OF THE HEARING**

**ONCE REGISTERED, PARTIES WILL RECEIVE A CONFIRMATION EMAIL
CONTAINING PERSONAL LOG-IN INFORMATION FOR THE HEARING.**

I. MATTERS GOING FORWARD

1. Debtor's Motion for Interim and Final Orders (I) Authorizing Debtor to (A) Maintain Existing Insurance Policies, (B) Pay All of the Debtor's Insurance Obligations, and (C) Renew, Revise, Extend, Supplement, Change, or Enter into New Insurance Policies; and (II) Granting Related Relief [[D.I. 11](#)] (Date Filed: June 2, 2022)

Objection/Response Deadline: June 22, 2022 at 4:00 p.m. (ET)

Objections/Responses Received:

- a. Limited Response of Mascaro/Barton Malow, a Joint Venture, to Debtor's Motion for Interim and Final Orders (I) Authorizing Debtor to (A) Maintain Existing

¹ The Debtor and the last four digits of its taxpayer identification number are: GT Real Estate Holdings, LLC (9589). The location of the Debtor's principal office is 800 South Mint Street, Charlotte, NC 28202.

² Amendments to the Agenda are in bold.

Insurance Policies, (B) Pay All of the Debtor's Insurance Obligations, and (C) Renew, Revise, Extend, Supplement, Change, or Enter into New Insurance Policies; and (II) Granting Related Relief [[D.I. 94](#)] (Date Filed: June 22, 2022)

Related Documents:

- b. Declaration of Jonathan Hickman, Chief Restructuring Officer of the Debtor, in Support of Chapter 11 Petition and First Day Pleadings [[D.I. 8](#)] (Date Filed: June 2, 2022)
- c. Interim Order (I) Authorizing Debtor to (A) Maintain Existing Insurance Policies, (B) Pay All of the Debtor's Insurance Obligations, and (C) Renew, Revise, Extend, Supplement, Change, or Enter into New Insurance Policies; and (II) Granting Related Relief [[D.I. 51](#)] (Date Filed: June 6, 2022)
- d. Notice of Hearing and Entry of Interim Order (I) Authorizing Debtor to (A) Maintain Existing Insurance Policies, (B) Pay All of the Debtor's Insurance Obligations, and (C) Renew, Revise, Extend, Supplement, Change, or Enter Into New Insurance Policies; and (II) Granting Related Relief [[D.I. 60](#)] (Date Filed: June 7, 2022)
- e. Notice of Filing of Redline of Insurance Order [[D.I. 116](#)] (Date Filed: June 26, 2022)
- f. [Proposed] Final Order (I) Authorizing Debtor to (A) Maintain Existing Insurance Policies, (B) Pay All of the Debtor's Insurance Obligations, and (C) Renew, Revise, Extend, Supplement, Change, or Enter into New Insurance Policies; and (II) Granting Related Relief [[D.I. 116-2](#), [Ex. 2](#)] (Date Filed: June 26, 2022)

Status: A revised order has been submitted to clarify and resolve the Limited Response of MBM, but MBM has failed to respond to the Debtor's revisions.

- 2. Debtor's Motion for order (I) Extending Time to File (A) Schedules of Assets and Liabilities, (B) Schedules of Current Income and Expenditures, (C) Schedules of Executory Contracts and Unexpired Leases, and (D) Statements of Financial Affairs; (II) Extending the Time to File Rule 2015.3 Financial Reports; and (III) Granting Related Relief [[D.I. 82](#)] (Date Filed: June 14, 2022)

Objection/Response Deadline: June 22, 2022 at 4:00 p.m. (ET)

Objections/Responses Received:

- a. Limited Response of Mascaro/Barton Malow, a Joint Venture, to Motion for order (I) Extending Time to File (A) Schedules of Assets and Liabilities, (B) Schedules of Current Income and Expenditures, (C) Schedules of Executory Contracts and Unexpired Leases, and (D) Statements of Financial Affairs; (II) Extending the Time to File Rule 2015.3 Financial Reports; and (III) Granting Related Relief [[D.I. 95](#)] (Date Filed: June 22, 2022)

Related Documents:

- b. Notice of Filing of Redline of Schedules Order [\[D.I. 117\]](#) (Date Filed: June 26, 2022)
- c. [Proposed] Order (I) Extending Time to File (A) Schedules of Assets and Liabilities, (B) Schedules of Current Income and Expenditures, (C) Schedules of Executory Contracts and Unexpired Leases, and (D) Statements of Financial Affairs; (II) Extending the Time to File Rule 2015.3 Financial Reports; and (III) Granting Related Relief [\[D.I. 117-2\]](#) (Date Filed: June 26, 2022)

Status: A revised order has been submitted to clarify and resolve the Limited Response of MBM, but MBM has failed to respond to the Debtor's revisions.

- 3. Debtor's Motion for Leave to File and Serve a Late Reply in Support of Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to obtain Post-Petition Financing, (II) Granting Liens and Super-Priority Claims, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [\[D.I. 108\]](#) (Date Filed: June 24, 2022)

Objection/Response Deadline: June 29, 2022 at 10:00 a.m. (ET)

Objections/Responses Received:

- a. None at this time.

Related Documents:

- b. [Proposed] Order Granting Debtor's Motion for Leave to File and Serve Late Reply in Support of Its DIP Motion [\[D.I. 108-1\]](#) (Date Filed: June 24, 2022)

Status: This matter is going forward.

- 4. Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to obtain Post-Petition Financing, (II) Granting Liens and Super-Priority Claims, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [\[D.I. 9\]](#) (Date Filed: June 2, 2022)

Objection/Response Deadline: June 22, 2022 at 4:00 p.m. (ET)

Objections/Responses Received:

- a. Objection of MSS Solutions, LLC and MSS Fire & Security, LLC to Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to obtain Post-Petition Financing, (II) Granting Liens and Super-Priority Claims, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [\[D.I. 92\]](#) (Date Filed: June 22, 2022)

- b. Objection of City of Rock Hill to Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to obtain Post-Petition Financing, (II) Granting Liens and Super-Priority Claims, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [[D.I. 96](#)] (Date Filed: June 22, 2022)
- c. Objection of Mascaro/Barton Malow, a Joint Venture, to Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to obtain Post-Petition Financing, (II) Granting Liens and Super-Priority Claims, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [[D.I. 97](#)] (Date Filed: June 22, 2022)
- d. Limited Objection of York County, South Carolina to Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to obtain Post-Petition Financing, (II) Granting Liens and Super-Priority Claims, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [[D.I. 98](#)] (Date Filed: June 22, 2022)
- e. Protective Objection of Precision Walls, Inc. to Debtor's Motion for Approval of Post-Petition Financing [[D.I. 99](#)] (Date Filed: June 22, 2022)
- f. Joinder of Crown Corr, Inc. to Objection of MSS Solutions, LLC and MSS Fire & Security, LLC to Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to obtain Post-Petition Financing, (II) Granting Liens and Super-Priority Claims, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [[D.I. 101](#)] (Date Filed: June 22, 2022)
- g. Objection of SteelFab, Inc. and Warco Construction, Inc. to Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to obtain Post-Petition Financing, (II) Granting Liens and Super-Priority Claims, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [[D.I. 103](#)] (Date Filed: June 22, 2022)

Related Documents:

- h. Declaration of Jonathan Hickman, Chief Restructuring Officer of the Debtor, in Support of Chapter 11 Petition and First Day Pleadings [[D.I. 8](#)] (Date Filed: June 2, 2022)
- i. Declaration of Jonathan Hickman, Chief Restructuring Officer of the Debtor, in Support of Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to obtain Post-Petition Financing, (II) Granting Liens and Super-Priority Claims, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [[D.I. 10](#)] (Date Filed: June 2, 2022)
- j. Interim Order Pursuant to Sections 105, 361, 362, 363, and 364 of the Bankruptcy Code and Bankruptcy Rules 2002, 4001, 6004, and 9014 (I) Authorizing the

Debtor to Obtain Secured Superpriority Postpetition Financing and Grant Liens and Superpriority Administrative Claims, and (II) Granting Related Relief [D.I. 53] (Date Filed: June 6, 2022)

- k. Notice of Hearing and Entry of Interim Order (I) Authorizing The Debtor to Obtain Post-Petition Financing, (II) Granting Liens and Super-Priority Claims, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [D.I. 59] (Date Filed: June 7, 2022)
- l. Debtor's Omnibus Reply in Support of Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to obtain Post-Petition Financing, (II) Granting Liens and Super-Priority Claims, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [D.I. 115] (Date Filed: June 26, 2022)
- m. Supplemental Declaration of Jonathan Hickman, Chief Restructuring Officer of the Debtor, In Support of Debtor's Motion for Entry of Interim and final Orders (I) Authorizing the Debtor to Obtain Postpetition Financing, (II) Granting Liens and Super-Priority Claims, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [D.I. 118] (Date Filed: June 26, 2022)
- n. Notice of Filing of Redline of Final DIP Order [D.I. 119] (Date Filed: June 26, 2022)
- o. [Proposed] Final Order Pursuant to Sections 105, 361, 362, 363, and 364 of the Bankruptcy Code and Bankruptcy Rules 2002, 4001, 6004, and 9014 (I) Authorizing the Debtor to Obtain Secured Superpriority Postpetition Financing and Grant Liens and Superpriority Administrative Claims, and (II) Granting Related Relief [D.I. 119-1] (Date Filed: June 26, 2022)
- p. **Notice of Filing of Updated DIP Budget [D.I. 125] (Date Filed: June 27, 2022)**

Status: This matter is going forward.

- 5. Motion of Mascaro/Barton Malow, a Joint Venture, to Transfer Venue to the Bankruptcy Court for the District of South Carolina [D.I. 112] (Date Filed: June 24, 2022)

Objection/Response Deadline: N/A

Objections/Responses Received:

- a. Debtor's Objection to Motion to Shorten Time for Notice of the Hearing on, and the Deadline to Respond to, Motion of Mascaro/Barton Malow, a Joint Venture, to Transfer Venue to the Bankruptcy Court for the District of South Carolina [D.I. 120] (Date Filed: June 26, 2022)
- b. **Joinder of MSS Solutions, LLC and MSS Fire & Security, LLC in Motion of**

Mascaro/Barton Malow, a Joint Venture, to Transfer Venue to the Bankruptcy Court for the District of South Carolina [D.I. 123] (Date Filed: June 27, 2022)

- c. **Joinder of Baker Roofing Company in Motion of Mascaro/Barton Malow, a Joint Venture, to Transfer Venue to the Bankruptcy Court for the District of South Carolina [D.I. 132] (Date Filed: June 27, 2022)**
- d. **Joinder of Precision Walls, Inc. in Motion of Mascaro/Barton Malow, a Joint Venture, to Transfer Venue to the Bankruptcy Court for the District of South Carolina [D.I. 133] (Date Filed: June 27, 2022)**
- e. **Joinder of Deacon Foodservice Solutions, LLC in Motion of Mascaro/Barton Malow, a Joint Venture, to Transfer Venue to the Bankruptcy Court for the District of South Carolina [D.I. 134] (Date Filed: June 27, 2022)**
- f. **Joinder of SteelFab, Inc. in Motion of Mascaro/Barton Malow, a Joint Venture, to Transfer Venue to the Bankruptcy Court for the District of South Carolina [D.I. 138] (Date Filed: June 28, 2022)**
- g. **Joinder of Warco Construction, Inc. in Motion of Mascaro/Barton Malow, a Joint Venture, to Transfer Venue to the Bankruptcy Court for the District of South Carolina [D.I. 139] (Date Filed: June 28, 2022)**
- h. **Joinder of Crown Corr, Inc. in Motion of Mascaro/Barton Malow, a Joint Venture, to Transfer Venue to the Bankruptcy Court for the District of South Carolina [D.I. 142] (Date Filed: June 28, 2022)**

Related Documents:

- i. Motion for Order to Shorten Time for Notice of the Hearing on, and the Deadline to Respond to, Motion of Mascaro/Barton Malow, a Joint Venture, to Transfer Venue to the Bankruptcy Court for the District of South Carolina [D.I. 113] (Date Filed: June 24, 2022)

Status: This matter is going forward to discuss scheduling only.

II. RESOLVED MATTERS

- 6. Debtor's Motion for Order (I) Authorizing Continued Maintenance and Use of Prepetition Bank Account; (II) Authorizing Continued Use of Existing Checks and Other Business Forms; (III) Waiving the Deposit and Investment Requirement of 11 U.S.C. § 345(b); and (IV) Granting Related Relief [D.I. 3] (Date Filed: June 2, 2022)

Objection/Response Deadline: June 22, 2022 at 4:00 p.m. (ET)

Objections/Responses Received:

- a. None

Related Documents:

- b. Declaration of Jonathan Hickman, Chief Restructuring Officer of the Debtor, in Support of Chapter 11 Petition and First Day Pleadings [[D.I. 8](#)] (Date Filed: June 2, 2022)
- c. Interim Order (I) Authorizing Continued Maintenance and Use of Prepetition Bank Account; (II) Authorizing Continued Use of Existing Checks and Other Business Forms; (III) Waiving the Deposit and Investment Requirement of 11 U.S.C. § 345(b); and (IV) Granting Related Relief [[D.I. 48](#)] (Date Filed: June 6, 2022)
- d. Notice of Hearing and Entry of Interim Order (I) Authorizing Continued Maintenance and Use of Prepetition Bank Account; (II) Authorizing Continued Use of Existing Checks and Other Business Forms; (III) Waiving the Deposit and Investment Requirement of 11 U.S.C. § 345(B); and (IV) Granting Related Relief [[D.I. 57](#)] (Date Filed: June 7, 2022)
- e. [Proposed] Final Order (I) Authorizing Continued Maintenance and Use of Prepetition Bank Account; (II) Authorizing Continued Use of Existing Checks and Other Business Forms; (III) Waiving the Deposit and Investment Requirement of 11 U.S.C. § 345(b); and (IV) Granting Related Relief [[D.I. 57-1, Ex. B](#)] (Date Filed: June 7, 2022)
- f. Certificate of No Objection [[D.I. 109](#)] (Date Filed: June 24, 2022)

Status: **The Order was entered at [D.I. 128](#).**

- 7. Debtor's Motion for Interim and Final Orders (I) Approving Debtor's Proposed Form of Adequate Assurance of Payment to Utility Providers; (II) Establishing Procedures for Resolving Objections by Utility Providers; (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services, and (IV) Granting Related Relief [[D.I. 4](#)] (Date Filed: June 2, 2022)

Objection/Response Deadline: June 22, 2022 at 4:00 p.m. (ET)

Objections/Responses Received:

- a. None

Related Documents:

- b. Declaration of Jonathan Hickman, Chief Restructuring Officer of the Debtor, in Support of Chapter 11 Petition and First Day Pleadings [[D.I. 8](#)] (Date Filed: June 2, 2022)

- c. Notice of Hearing and Entry of Interim Order (I) Approving Debtor's Proposed Form of Adequate Assurance of Payment to Utility Providers; (II) Establishing Procedures for Resolving Objections By Utility Providers; (III) Prohibiting Utility Providers From Altering, Refusing, or Discontinuing Services, and (IV) Granting Related Relief [[D.I. 58](#)] (Date Filed: June 7, 2022)
- d. Interim Order (I) Approving Debtor's Proposed Form of Adequate Assurance of Payment to Utility Providers; (II) Establishing Procedures for Resolving Objections by Utility Providers; (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services, and (IV) Granting Related Relief [[D.I. 49](#)] (Date Filed: June 6, 2022)
- e. [Proposed] Final Order (I) Approving Debtor's Proposed Form of Adequate Assurance of Payment to Utility Providers; (II) Establishing Procedures for Resolving Objections by Utility Providers; (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services, and (IV) Granting Related Relief [[D.I. 58-1, Ex. B](#)] (Date Filed: June 7, 2022)
- f. Certificate of No Objection [[D.I. 110](#)] (Date Filed: June 24, 2022)

Status: **The Order was entered at [D.I. 129](#).**

- 8. Debtor's Motion for Order Establishing Bar Dates and Related Procedures for Filing Proofs of Claims, Including Claims Arising Under Section 503(b)(9) of the Bankruptcy Code, and Approving the Form and Manner of Notice Thereof [[D.I. 81](#)] (Date Filed: June 14, 2022)

Objection/Response Deadline: June 22, 2022 at 4:00 p.m. (ET)

Objections/Responses Received:

- a. None

Related Documents:

- b. [Proposed] Bar Date Order [[D.I. 81-1](#)] (Date Filed: June 14, 2022)
- c. Certificate of No Objection [[D.I. 111](#)] (Date Filed: June 24, 2022)

Status: **The Order was entered at [D.I. 131](#).**

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Dated: June 28, 2022

Respectfully submitted,

FARNAN LLP

/s/ Michael J. Farnan

Joseph J. Farnan, Jr. (Bar No. 100245)

Brian E. Farnan (Bar No. 4089)

Michael J. Farnan (Bar No. 5165)

919 North Market Street, 12th Floor

Wilmington, Delaware 19801

Telephone: (302) 777-0300

Email: farnan@farnanlaw.com

bfarnan@farnanlaw.com

mfarnan@farnanlaw.com

WHITE & CASE LLP

Thomas E Lauria (*pro hac vice*)

Varoon Sachdev (*pro hac vice*)

Southeast Financial Center

200 South Biscayne Boulevard, Suite 4900

Miami, FL 33131

Telephone: (305) 371-2700

Email: tlauria@whitecase.com

varoon.sachdev@whitecase.com

Stephen Moeller-Sally (*pro hac vice*)

Mark Franke (*pro hac vice*)

Brandon Batzel (*pro hac vice*)

1221 Avenue of the Americas

New York, NY 10020

Telephone: (212) 446-4800

Email: ssally@whitecase.com

mark.franke@whitecase.com

brandon.batzel@whitecase.com

William A. Guerrieri (*pro hac vice*)

111 South Wacker Drive, Suite 5100

Chicago, IL 60606

Telephone: (312) 881-5400

Email: william.guerrieri@whitecase.com

*Proposed Counsel to the Debtor and
Debtor-in-Possession*